

AUG 16 2011

AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY _____ DEPUTY

ATTACHMENT A: STIPULATED FACTS – JONATHAN TAGLIALATELA

The undersigned parties hereby stipulate and agree that if this case had proceeded to trial, the government would have proven the following facts beyond a reasonable doubt. The undersigned parties also stipulate and agree that the following facts do not encompass all of the evidence that would have been presented had this matter proceeded to trial.

At all times relevant to this case, defendant **JONATHAN TAGLIALATELA**, was a resident of Laurel, Maryland.

Between 2004 and 2009, **TAGLIALATELA** actively searched for and downloaded images and videos of children engaged in sexually explicit conduct on the Internet. **TAGLIALATELA** utilized the file share programs Limewire, Morpheus and Bearshare to search for and download child pornography.

On August 18, 2010, **TAGLIALATELA** was interviewed by agents concerning his downloading and possession of child pornography. **TAGLIALATELA** confessed to agents that he utilized file-share programs to search for and download images and videos of child pornography. **TAGLIALATELA**'s preferred image and video files of girls from ages 12 to 18 years. **TAGLIALATELA** would masturbate to these images and videos and save them to a folder he titled "Porn." **TAGLIALATELA** provided consent for agents to forensically examine his computer and digital media.

On September 8, 2010, a federal search warrant was executed at the residence occupied by **TAGLIALATELA**. **TAGLIALATELA** agreed to be interviewed by agents and advised that he had been viewing child pornography for approximately four years. **TAGLIALATELA** used search terms such as "pedo," "lolita," and "hussyfan" to search file share programs for child pornography images and videos. He advised that in 2009 he stopped searching for and downloading child pornography. He also advised that he would masturbate to images depicting the vaginal penetration of children. During this search, computers and digital media items were seized.

A forensic examination was conducted on the digital items seized from **TAGLIALATELA**'s residence and approximately 50 video files and 500 image files depicting children engaged in sexually explicit conduct were on **TAGLIALATELA**'s computer. The following videos were located on the digital media seized at **TAGLIALATELA**'s residence on September 18, 2010:

- * Pedo 3.mpg - the video length is 1 minute and 16 seconds and depicts a prepubescent female being vaginally and anally penetrated by an adult male.
- * PTHC Video 17.mpg - the video length is 3 minutes and 22 seconds and depicts a naked prepubescent female tied at the wrist while she is standing and an adult male touches her genitals. The video later depicts a naked prepubescent female laying

down and tied at the thighs, stomach, and arms. While being tied down, the prepubescent female performs oral sex on the adult male.

- * Pedo - BabyJ-Long (1). mpg - the video length is 4 minutes and 13 seconds and depicts a prepubescent female performing oral sex on an adult male. The video later depicts an adult male vaginally penetrating a naked prepubescent female.

The images and videos depict real children engaged in sexually explicit conduct. The images downloaded onto the defendant's computer were transported through the Internet and therefore traveled in interstate commerce.

* * * * *

I have read this Statement of Facts and carefully reviewed every part of it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it.

8.16.11
Date


Jonathan Tagliatela

I am Jonathan Tagliatela's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is a voluntary one.

8/16/11
Date


Andrew R. Szekely, Esq.